

**From:** Franck Page  
**To:** [dentalboardconsultation](#)  
**Subject:** Changes to scope of practice  
**Date:** Sunday, 13 May 2018 7:31:16 PM  
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To whom it may concern,

I am writing to convey my surprise at to the need to change the scope of practice of Therapists/hygienists. Coastal dental care is a dentist owned collaborate of multiple practices on the Gold Coast. We currently have over 50 dentists in the group and around 10 hygienists/therapists. It is our experience that hygienists/therapists command higher and higher rates of pay and that in fact new graduates from our multiple dental schools are struggling to get a job. It is now easier to fill a dentist position rather than a therapist/hygienist. So why the need for change in the scope of practice? Hygienists/therapists are highly paid and almost rare to find. Graduate dentists are approaching us wanting to work as "hygienists/therapists". Hypothetically, given the hygienists/therapists are able to set up their practices without the need for a dentist, their scope of practice will still be restricted to their prescribed skill set. So, what happens to the patients that they need to refer? Who do they refer to? I think that given the increasing corporatisation of the dental industry this area of referral is rich grounds for kickbacks and abuse. Patients are already being shepherded by health funds to their own dental practices. I don't think it is beyond reason that a similar biased referral arrangement will result from deregulation of the scope of practice of hygienists/therapists.

Kind Regards,

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